

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )  
 )  
 v. ) Criminal No. 04-30034-MAP  
 )  
 MICHAEL CROOKER, )  
 Defendant. )

Government's Motion to Extend Time

The United States of America, by Michael J. Sullivan, United States Attorney for the District of Massachusetts, respectfully requests that the Court extend the government's time to file its memorandum in opposition to Mr. Crooker's additional motions until Monday, March 6, 2006.

Mr. Crooker has filed additional pretrial motions, including motions to suppress evidence from the searches of his residence, his car, his computer and his e-mail, as well as a Motion to Dismiss Indictment Due to the Unforeseeably Expansive Interpretation Doctrine which was filed on February 9, 2006. The government's response was due on Friday, February 24, 2006.

Due to the recent departure of Assistant U.S. Attorney Ariane Vuono, who previously was working on this case, and other work in the office, the government was unable to complete its response to Mr. Crooker's motions by February 24<sup>th</sup>.

The government expects that it will be able to file its response to all of Mr. Crooker's new motions by March 6<sup>th</sup>.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

by: /s/ Kevin O'Regan  
Kevin O'Regan  
Assistant U.S. Attorney

Date: February 28, 2006

Certificate of Service

February 28, 2006

I certify that I caused the foregoing document to be served on counsel for the defendant, Vincent Bongiorno, Esq, 95 State Street, Springfield, MA 01103.

/s/ Kevin O'Regan  
Kevin O'Regan  
Assistant U.S. Attorney